

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:** : **CHAPTER 13**  
**CRAIG BRADLEY DEIMLER** :  
**WILLIAM OLIVER FISHER-DEIMLER** : **CASE NO. 1:20-bk-00841**  
aka William Oliver Fisher Deimler; fka :  
William Oliver Fisher, :  
Debtors :  
: :  
**CRAIG BRADLEY DEIMLER** :  
**WILLIAM OLIVER FISHER-DEIMLER** :  
aka William Oliver Fisher Deimler; fka : **OBJECTION TO CLAIM # 32**  
William Oliver Fisher, :  
Movants :  
**v.**  
**JACKIE EVANGELISTA,**  
Respondent/Claimant

**OBJECTION TO PROOF OF CLAIM #32**

COME NOW the Debtors, by and through attorney Dorothy L. Mott, Esquire and make this Objection to Creditor's claim filed in the above-captioned bankruptcy proceeding, stating in support there of as follows:

1. The Debtors filed a Chapter 13 bankruptcy proceeding on 3/4/2020.
2. The Respondent, JACKIE EVANGELISTA, filed an unsecured priority claim on or about May 8, 2020 in the amount of \$1,982.00.
3. Federal Rule of Bankruptcy Procedure 3001(c) requires that 'when a claim, or an interest in property of the debtor securing the claim, is based on a writing, the original or a duplicate shall be filed with the proof of claim. If the writing has been lost or damaged, a statement of the circumstances of the loss or destruction shall be filed with the claim.'
4. The documents attached to the proof of claim demonstrate that the obligation is owed by GCD Construction, Inc., dba Deimler Family Construction. The contract is between the Claimant and GCD Construction, Inc.

5. The contract is written on letterhead of the corporation and includes the provision that the Respondents accept the contract with GCD Construction, Inc.

6. The check that the Claimant attaches to the proof of claim is payable to GCD Construction, Inc.

7. The Debtors have not personally guaranteed the obligation.

8. The names Craig Bradley Deimler and William Oliver Fisher-Deimler are not identified anywhere in the documentation. The Debtors are not personally liable for the corporate debt.

9. The Claimant does not attach documentation showing that the claim is a priority claim.

10. The claim should be disallowed because it is not a debt owed by the Debtors and because it is not a priority claim.

WHEREFORE, the Debtors hereby request that this Honorable Court enter an order

1. Disallowing and dismissing the claim; and

2. Precluding the Claimant from presenting the omitted information as evidence in any contested matter or adversary proceeding pursuant to Rule 3001(c)(2)(D)(i); and

3. Granting such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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Dorothy L. Mott, Esquire  
125 State Street  
Harrisburg, PA 17101  
717.232.6650 Tel  
717.232.0477 Fax  
doriemott@aol.com

**LOCAL BANKRUPTCY FORM 3007-1  
IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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<b>aka William Oliver Fisher Deimler; fka</b>	<b>:</b>	
<b>William Oliver Fisher,</b>	<b>:</b>	
<b>Objectors</b>	<b>:</b>	
	<b>:</b>	
<b>JACKIE EVANGELISTA,</b>		
<b>Respondent/Claimant</b>		

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**TO: JACKIE EVANGELISTA ("Claimant")**

**NOTICE OF OBJECTION TO CLAIM AND DEADLINE TO REQUEST HEARING DATE**

Craig Bradley Deimler has filed an objection to the proof of claim you filed in this bankruptcy case.

**NOTICE: Your claim may be reduced, modified, or eliminated.** You should read this notice and the objection carefully and discuss them with your attorney, if you have one.

If you do not want to the court to enter an order affecting your claim, then on or before March 4, 2021, (30 days from the date of service), you or your lawyer must file a request for hearing or a written response to the objection explaining your position.

Those not permitted to file electronically must deliver any request for hearing or response by U.S. mail, courier, overnight/express mail, or in person at: (select the appropriate address)

Ronald Reagan Federal Building  
228 Walnut Street Rm 320  
Harrisburg, PA 17101

If you mail your request for hearing or response to the court, you must mail it early enough so the court will receive on or before the date stated above.

You must also send a copy of your request for hearing or response to:

Dorothy L. Mott, Esquire

Mott & Gendron Law

125 State Street

Harrisburg, PA 17101

717. 232.6650 Tel

717.232.0476 Fax

doriemott@aol.com

**If you or your attorney do not take these steps, the court may decide that you do not oppose an order affecting your claim. Attorney for Objector**

/s/ Dorothy L. Mott

Dorothy L. Mott Law Office, LLC

PA ID: 43568

125 State Street, Harrisburg PA 17101

717. 232.6650 Tel

717.232.0476 Fax

doriemott@aol.com

Date of Notice: February 2, 2021

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v.  
**JACKIE EVANGELISTA,**  
Respondent/Claimant

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on February 2, 2021, I served a copy of the foregoing document(s) electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows on the following parties:

Name and Address	Mode of Service
CHARLES J DEHART, III ESQUIRE 8125 ADAMS DRIVE SUITE A HUMMELSTOWN PA 17036 <a href="mailto:dehartstaff@pAMD13trustee.com">dehartstaff@pAMD13trustee.com</a>	Electronically
JACKIE EVANGELISTA 4613 CUSTER DRIVE HARRISBURG, PA 17110-3209	First Class Mail, Postage Prepaid

I certify under penalty of perjury that the foregoing is true and correct.

Date: 02/02/2021

/s/Dorothy L Mott

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Dorothy L Mott, Esquire  
Atty ID #43568  
Dorothy L. Mott Law Office, LLC  
125 State Street  
Harrisburg, PA 17101  
(717) 232-6650 TEL  
(717) 232-0477 FAX  
[doriemott@aol.com](mailto:doriemott@aol.com)

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	<b>:</b>	
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<b>JACKIE EVANGELISTA,</b>	<b>:</b>	
<b>Respondent/Claimant</b>	<b>:</b>	

**O R D E R**

UPON CONSIDERATION of the Objection to Proof of Claim filed by the Debtors, it is hereby

ORDERED that the claim of the Respondent is disallowed and dismissed; it is further

ORDERED that the Claimant is precluded from presenting the omitted information as evidence in any contested matter or adversary proceeding pursuant to Rule 3001(c)(2)(D)(i)